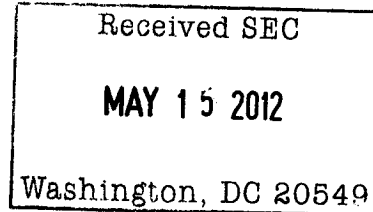


Certnas

1-35485  
**NASDAQ**  
THE NASDAQ OMX GROUP



William Slattery, CFA  
Senior Vice President  
Listing Qualifications



By Electronic Mail

May 14, 2012

Ms. Cecile Peters  
Chief, IT Services  
Division of Corporation Finance  
U.S. Securities and Exchange Commission  
100 F Street, N.E.  
Washington, D.C. 20549

Dear Ms. Peters:

By letter dated March 29, 2012, I advised you that the Exchange had received a Form 8-A from Luca Technologies Inc. for registration of its Common stock, par value per \$.001 share and the Exchange had approved the security for listing and registration upon official notice of issuance.

Since then, we have been advised that the company wishes to withdraw its application to list the security on the Exchange. Accordingly, we hereby withdraw our earlier certification of approval.

Sincerely,

*William Slattery*